

EXHIBIT 1

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MINA DE ORO, LLC, a Nevada limited liability company; THE TOY CHEST, LLC a Nevada limited liability company,

Plaintiffs,

v.

MATTHEW BRENT GOETTSCHKE, an individual, JOBEDIAH SINCLAIR WEEKS, an individual, JOSEPH FRANK ABEL, an individual, SILVIU CATALIN BALACI, an individual, BITCLUB, an unknown entity, and DOE and ROE Corporations,

Defendants.

Case No: 2:20-cv-00994

**DECLARATION OF LORI DIAZ IN
SUPPORT OF APPLICATION FOR
DEFAULT JUDGMENT
AGAINST DEFENDANT
JOBEDIAH SINCLAIR WEEKS**

I, Lori Diaz declare:

1. I am a manager of Plaintiff The Toy Chest, LLC ("The Toy Chest") and am authorized to make this Declaration on The Toy Chest's behalf.

2. During the spring of 2018, Defendants, including Jobediah Sinclair Weeks ("Weeks") engaged in solicitation of The Toy Chest to participate in a Bitcoin ("BTC") by offering for sale shares of BTC mining business issued by Defendants, including Weeks.

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1 3. To The Toy Chest's knowledge, Defendants, including Weeks, engaged in these
2 private and public solicitations through a website www.bitclub.com ("Bitclub") wherein the
3 Defendants, including Weeks, created and maintained a website for the Bitclub Offering, and
4 through independent business operators within the Bitclub scheme through the means or
5 instrumentalities of interstate commerce, including email and the internet.

6 4. In an effort to solicit The Toy Chest and to induce it into investing in the Bitclub
7 Offering, Defendants, including Weeks, made the following untrue statements of material fact to
8 The Toy Chest (the "Bitclub Misrepresentation"):

- 9 a. misleading figures regarding the amount of crypto currency mining
10 operations in place;
- 11 b. misleading figures regarding the amount of crypto currency being mined
12 at Bitclub controlled mining operations;
- 13 c. misleading figures and documentation regarding the amount of future
14 profit to be derived from the Bitcoin mining operations;
- 15 d. fraudulent statements from Defendants and Defendants' independent
16 business operators within the multi-level marketing scheme regarding
17 commissions to be paid for joining the Bitclub Scheme and recruiting
18 others to join the Bitclub Scheme and invest in the Bitclub Offering;
- 19 e. misleading statements regarding future operations and investments by the
20 Bitclub management;
- 21 f. untrue and misleading statements regarding access to funds invested in the
22 Bitclub Offering through an internet based website.

23 5. In reasonable and justified reliance upon the Bitclub Misrepresentations and
24 Bitclub Omissions made by Defendants, including Weeks, The Toy Chest invested \$250,000.00
25 USD with Defendants for purchase of the Bitclub Offering.

26 6. Subsequent to their solicitation and sale of the Bitclub Offering to The Toy Chest,
27 Defendants, including Weeks, materially breached and defaulted on their obligations to The Toy
28 Chest under the parties' contracts by, among other actions:

- a. failing and refusing to pay dividends, bonuses and other compensation due to the The Toy Chest as required by the investor contracts;
- b. repeatedly misrepresenting and concealing the true nature and status of the The Toy Chest's investments in Bitclub as well as the finances, operations and legal status of Bitclub; and

7. As a direct and proximate consequence of the Defendants' unlawful conduct as described herein, the The Toy Chest lost the \$250,000.00 USD investment.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 10th day of March, 2023.



The Toy Chest, LLC

By: Lori Diaz, its manager

EXHIBIT 2

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Defendants.

Case No: 2:20-cv-00994

**DECLARATION OF LOUIS DIAZ IN
SUPPORT OF APPLICATION FOR
DEFAULT JUDGMENT
AGAINST DEFENDANT
JOBEDIAH SINCLAIR WEEKS**

I, Louis Diaz declare:

1. I am a manager of Plaintiff Mina De Oro, LLC ("Mina De Oro") and am authorized to make this Declaration on Mina De Oro's behalf.

2. During the spring of 2018, Defendants, including Jobediah Sinclair Weeks ("Weeks") engaged in solicitation of Mina De Oro to participate in a Bitcoin ("BTC") by offering for sale shares of BTC mining business issued by Defendants, including Weeks.

1 3. To Mina De Oro's knowledge, Defendants, including Weeks engaged in these
2 private and public solicitations through a website www.bitclub.com ("Bitclub") wherein the
3 Defendants, including Weeks, created and maintained a website for the Bitclub Offering, and
4 through independent business operators within the Bitclub scheme through the means or
5 instrumentalities of interstate commerce, including email and the internet.

6 4. In an effort to solicit Mina De Oro and to induce it into investing in the Bitclub
7 Offering, Defendants, including Weeks, made the following untrue statements of material fact to
8 Mina De Oro (the "Bitclub Misrepresentation"):

- 9 a. misleading figures regarding the amount of crypto currency mining
10 operations in place;
- 11 b. misleading figures regarding the amount of crypto currency being mined
12 at Bitclub controlled mining operations;
- 13 c. misleading figures and documentation regarding the amount of future
14 profit to be derived from the Bitcoin mining operations;
- 15 d. fraudulent statements from Defendants and Defendants' independent
16 business operators within the multi-level marketing scheme regarding
17 commissions to be paid for joining the Bitclub Scheme and recruiting
18 others to join the Bitclub Scheme and invest in the Bitclub Offering;
- 19 e. misleading statements regarding future operations and investments by the
20 Bitclub management;
- 21 f. untrue and misleading statements regarding access to funds invested in the
22 Bitclub Offering through an internet based website.

23 5. In reasonable and justified reliance upon the Bitclub Misrepresentations and
24 Bitclub Omissions made by Defendants, including Weeks, Mina De Oro invested \$250,000.00
25 USD with Defendants for purchase of the Bitclub Offering.
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6. Subsequent to their solicitation and sale of the Biclub Offering to Mina De Oro, Defendants, including Weeks, materially breached and defaulted on their obligations to Mina De Oro under the parties' contracts by, among other actions:

- a. failing and refusing to pay dividends, bonuses and other compensation due to the Mina De Oro as required by the investor contracts;
- b. repeatedly misrepresenting and concealing the true nature and status of the Mina De Oro's investments in Bitclub as well as the finances, operations and legal status of Bitclub; and

7. As a direct and proximate consequence of the Defendants' unlawful conduct as described herein, the Mina De Oro lost the \$250,000.00 USD investment.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 10th day of March, 2023.



Mina De Oro, LLC

By: Louis Diaz, its manager

EXHIBIT 3

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Defendants.

Case No: 2:20-cv-00994

DECLARATION OF C. ROBERT PETERSON, ESQ. IN SUPPORT OF APPLICATION FOR DEFAULT JUDGMENT AGAINST DEFENDANT JOBEDIAH SINCLAIR WEEKS

I, C. Robert Peterson, Esq. declare:

1. I am the counsel for Plaintiffs in this matter and am competent to testify as to the matter set forth herein.


2. I am familiar with the facts of this case and after careful investigation in the cause and has been informed and believes that Jobediah Sinclair Weeks is not in the military service of the United States, nor an infant, nor an incompetent person.

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1 FURTHER DECLARANT SAYETH NAUGHT

2 I declare under penalty of perjury under the laws of the State of Nevada that the foregoing
3 is true and correct.

4 DATED this 10th day of March, 2023.

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7 C. Robert Peterson, Esq.
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